

1 They're in excess of -- I think there are
2 approximately 15 in here.

3 Did you or any member of your team
4 make any effort to determine that the Priority 1
5 problems listed on this log have been resolved?

6 A Well, again, given that we saw a log, a
7 more recent version of this with no Priority 1
8 problems, I can only assume they were resolved or
9 they'd be on the more recent log.

10 Q Then as to this version that was attached
11 to Mr. Connolly's testimony, is it now your
12 testimony that you have not reviewed this
13 document?

14 A Yeah. I reviewed the order testing
15 problem log, different date, that's correct.

16 Q And it only had open issues on it?

17 A Yeah. To my under- -- I remember seeing
18 two; one that said open issues and one that said
19 closed issues.

20 Q So then I just want to be clear on this.
21 This version that was attached to Mr. Connolly's
22 testimony you have not reviewed; is that correct?

1 A That's right. I was sent a copy of it.
2 That was a more recent version, but it's not the
3 exact same one.

4 Q How about the AIIS testing problem log
5 that was attached to Mr. Connolly's testimony,
6 have you had an opportunity to review that?

7 A Yeah. The other logs I have had a chance
8 to review.

9 Q All right. Of the numerous logs that were
10 attached to Mr. Connolly's testimony, did you
11 have any opportunity or did any member of your
12 team have an opportunity to determine if the
13 problems issued -- I'm sorry, the problems
14 reported on those logs have been resolved?

15 A No. We saw the reports about a week ago.
16 And since that time, all we've looked at is the
17 status. We have not looked to see if they've
18 been resolved. We know what's open. So we know
19 what has been closed since the initial version of
20 the report.

21 Q Let me refer you again to your testimony,
22 your supplemental rebuttal testimony, Page 11.

1 Again, the question in the middle of the page
2 says, In his testimony, Mr. Connolly refers to
3 certain Ameritech Illinois reports on order
4 rejections such as this order testing problem
5 log, the AIIS testing problem log, the telesphere
6 log, the resell bugs not fixed log, and the
7 issues general log. Have you reviewed these
8 reports? And your answer is yes. Is that answer
9 accurate or not?

10 A Yes. I already answered that, I think.

11 Q The next question says, Does the
12 information contained on these reports affect
13 your conclusion that Ameritech Illinois' systems
14 are operational ready? And your answer to that
15 is no.

16 A That's right.

17 Q And now I'm understanding you have not
18 even reviewed the order testing problem log as
19 attached to Mr. Connolly's testimony; is that
20 correct?

21 MS. SUNDERLAND: Excuse me. I think his
22 testimony is clear that he reviewed a more -- a

1 later vintage of that.

2 MS. MARSH: He said only with closed problems
3 on that which would --

4 THE WITNESS: No, no. Let me --

5 MS. SUNDERLAND: No, he said he saw both.

6 THE WITNESS: Let me explain.

7 JUDGE GUERRA: One at a time.

8 THE WITNESS: Let me explain. There's two
9 logs, an open issues and a closed, I believe it
10 is called.

11 We reviewed the open issues as of
12 whatever the date was a few days ago, middle of
13 last week, the severity and number of logs. And
14 I can produce that somewhere. We have it in the
15 room here. There was 45, I believe, open issues
16 still.

17 Out of those 45, there was no Severity
18 1 errors on those. And given when I look at a
19 complex system such as this, it's not uncommon to
20 have several hundred bugs open in a system even
21 after it goes into production.

22 So based on the fact that there was 45

1 and that none of them were Severity 1, it did not
2 affect my opinion with respect to the readiness
3 conclusion that we have reached earlier. That's
4 all.

5 BY MS. MARSH:

6 Q And I think you also indicated that you
7 reviewed a log that had closed issues on it;
8 correct?

9 A Yes.

10 Q Did anybody on your team make any effort
11 to determine what work had been done by Ameritech
12 to close those issues?

13 A No. We had to go off the log.

14 Q Did anybody on your team make any effort
15 to verify that those issues had indeed been
16 resolved as Ameritech said they had been
17 resolved?

18 A No. We did not see any rejections for
19 those reasons coming across on the production,
20 but we did not verify that someone went in and
21 changed code to fix it.

22 Q Well, let's talk about some of the

1 individual problems so we can understand what
2 work you did in connection with them.

3 Do you know what an 865 is,
4 Mr. Meixner?

5 A That's, I believe, the order completion.

6 Q And do you know when the Ameritech systems
7 generate or are supposed to generate 865s?

8 A I assume after an order completes.

9 Q How soon after an order completes?

10 A I don't know. We looked at the interfaces
11 and the 865s come out of the legacy systems. So
12 I really didn't follow that through to
13 completion. I don't know the time frame.

14 Q Is it your testimony that Anderson
15 Consulting did not look at the performance of the
16 underlying legacy systems in connection with
17 Ameritech's OSS offering?

18 A That's correct.

19 Q Do you think that it is appropriate to
20 render a decision or an opinion as to operational
21 readiness of these systems without having
22 reviewed the performance of the legacy systems?

1 A Well, yes, if your opinion is on the
2 interfaces.

3 Q So if I understand the scope of your
4 opinion, it's only on the link directly between a
5 CLEC and Ameritech, it is not on how the
6 underlying systems perform?

7 A Not the back end legacy systems. Once it
8 goes through the system, my understanding is that
9 it takes the same transaction path as an
10 Ameritech retail system. But we did not look
11 further down stream to see if there were any
12 differences or if there were any other changes.

13 Q If there were problems with the
14 underlying -- the operation of the underlying
15 legacy systems that were impacting the way in
16 which CLEC orders were being processed, would
17 that affect your opinion on operational
18 readiness?

19 A Well, again, the opinion was only based on
20 the interfaces. But if you're looking at end to
21 end type of integration, I suppose it could be based
22 on these logs which included, I believe, problems

1 both with the interfaces and the downstream
2 legacy systems.

3 I didn't see anything again of the
4 most recent version that would jump out at me and
5 say, hey, there's a big problem here, but I did
6 not review those systems.

7 Q Did you review the testimony that was
8 provided by the Ameritech witness at the
9 Wisconsin proceeding?

10 A Joe Rogers?

11 Q Yes.

12 A I think I read it, yes.

13 Q Are you aware of the fact that after a
14 discussion of these problems, system problems,
15 Mr. Rogers concluded that the systems were not at
16 that time operational ready?

17 A I think I saw that in the transcript. And
18 I think later didn't he change, you know --
19 say --

20 MS. SUNDERLAND: I'm going to object to
21 asking Mr. Meixner to have an opinion on
22 something Mr. Rogers said. Mr. Rogers will be

1 here.

2 MS. MARSH: It's appropriate for this expert
3 to review testimony from Ameritech witnesses and
4 rendering opinions and that was sworn testimony
5 which is now in --

6 MS. SUNDERLAND: And you have not yet
7 demonstrated it has anything to do with the
8 interfaces.

9 MS. MARSH: It has everything to do with
10 operational readiness.

11 MS. SUNDERLAND: But we're making a
12 distinction here between the interfaces and the
13 systems. She has not established the question
14 she is asking is related to the opinion that
15 Mr. Meixner is rendering.

16 JUDGE GUERRA: Read the question back.

17 (Record read as requested.)

18 JUDGE GUERRA: What is your objection?

19 MS. SUNDERLAND: My objection is that I think
20 Ms. Marsh, when she talks about operational
21 readiness, is talking about, you know, an end to
22 end operational readiness for the systems.

1 I think Mr. Meixner has tried to
2 explain that the work that his team did was
3 focused on one part of that end to end
4 relationship. His team focused on the interfaces
5 themselves.

6 And whatever Mr. Rogers said in
7 Wisconsin may or may not have been related to the
8 interfaces. It may have been related to legacy
9 systems, to downstream issues. And I think it's
10 fundamentally --

11 JUDGE GUERRA: Objection is sustained. If
12 you can reword it or lay a better foundation.

13 BY MS. MARSH:

14 Q Do you know if the opinions rendered by
15 Mr. Rogers in Wisconsin relate to just the
16 interfaces or the function of the system itself?

17 A I don't know. I don't remember the
18 testimony.

19 Q Can you tell me -- strike that.

20 JUDGE GUERRA: Let's go off the record for a
21 second.

22 (Discussion off the record.)

1 JUDGE GUERRA: Let's take a break.

2 (Recess.)

3 BY MS. MARSH:

4 Q All right.

5 Mr. Meixner, as I understand it now,
6 your opinions run only to a review of the
7 interfaces being used by Ameritech, not the
8 underlying legacy systems; is that correct?

9 A Yes, that was the scope of our review.

10 Q Now, on April 16th, Ameritech reported to
11 the Dow Jones News Service that Arthur
12 Anderson -- and this is a quote -- Arthur
13 Anderson had reviewed its ordering system
14 recently and verified its readiness to be hooked
15 up to other carriers, quote closed.

16 Is that statement accurate given your
17 testimony?

18 A Reviewed it, OSS?

19 Q Ordering system.

20 A Ordering system. Depends on how you
21 define ordering system. You place orders through
22 the interface. So I guess you could argue that

1 it works through the ordering system, you know.

2 Q If you define the use of the word ordering
3 system in that phrase to mean the entire system
4 used by Ameritech to process CLEC orders, is that
5 quote accurate?

6 A Probably not. I think we looked at the
7 interfaces and Joe Rogers' team looked at the
8 downstream systems.

9 Q Just a couple questions just to make sure
10 I understand the scope of the review that your
11 team did.

12 As to the late 865 problem, did your
13 team attempt in any way to assess whether CLECs
14 were receiving 865 notifications late?

15 A No.

16 Q Okay. If there was evidence that CLECs
17 were on a regular basis receiving 865
18 notifications late, would that affect your
19 opinion as to operational readiness?

20 A Of the interfaces or the entire system? I
21 was just --

22 Q The opinions you're rendering in this

1 docket.

2 A Yeah. The opinions I'm rendering in this
3 docket affect the interfaces. And the fact that
4 the 865s come out of the downstream system, you
5 know, I can't say I did not look at that and
6 don't know about it.

7 Q So then the answer is that would not
8 affect your opinion as to operational readiness?

9 A Right.

10 Q Are you aware of the fact that some CLEC
11 customers are being double billed for usage?

12 A I read in Mr. -- I don't remember if it
13 was Mr. Connolly's or Holly Miller's testimony
14 something about that, yes.

15 Q And if there was evidence that, in fact,
16 there were certain AT&T customers that were being
17 double billed, would that affect your opinion as
18 to operational readiness in this docket?

19 A It would depend on the extent of the
20 problem. If it affected one customer or two
21 customers, probably not. If it was pervasive,
22 you'd have to look at it.

1 Q What is pervasive?

2 A You know, it would have to have them --
3 you know, I don't know how I would define that.
4 I know I get bills today from American Express or
5 Mastercard and they have errors, but I consider
6 those systems operationally ready and --

7 Q Well, if you saw evidence that Ameritech
8 itself has identified potentially 157 customers,
9 AT&T customers, that are potentially being double
10 billed, would that affect your opinions as to
11 operational readiness in this docket?

12 A That's not an interface issue. That's --
13 again, billing is a downstream system.

14 Q What about -- have you seen any evidence
15 of back logged orders?

16 A Please define what a back logged order is.

17 Q Sure. Do you know what an 855 transaction
18 is?

19 A Is that the acknowledgment?

20 Q Yes.

21 A Okay.

22 Q Isn't that a transaction that is generated

1 by the interface and sent to a CLEC upon receipt
2 of an order?

3 A I'm not sure it comes out of the
4 interface, but I think that's right.

5 Q When you say interface, what system are
6 you referring to?

7 A The systems that receive the order and
8 post it to the Mortel database.

9 Q And does that system have a name?

10 A Just the AIIS Gateway systems. There's a
11 whole series.

12 Q And so your opinions as to interface focus
13 on the AIIS Gateway; is that correct?

14 A Right.

15 Q Now, the 855s, I believe, are generated by
16 the Mortel system --

17 A Okay.

18 Q -- upon receipt of an order?

19 A If it's just the order of acknowledgment
20 that we received it, that sounds reasonable.

21 Q And would you agree that that issue would
22 be relevant to a review of the interface?

1 A If it's produced by the interface, yes.

2 Q Have you seen any evidence of the fact
3 that the Mortel system is not timely sending 855
4 notices back to CLECs because of a backlog?

5 A No, I haven't.

6 Q If there was evidence that orders were
7 being backlogged in the Mortel systems and 855s
8 were not being generated, would that affect your
9 opinion as to operational readiness?

10 A I don't know. I'd have to see what the
11 evidence was.

12 Q Well, I happen to have some.

13 MS. MARSH: I will mark this as AT&T 19.

14 (Whereupon, AT&T Cross
15 Exhibit No. 19 was
16 marked for identification,
17 as of this date.)

18 BY MS. MARSH:

19 Q Mr. Meixner, this is a chart that was
20 prepared by AT&T using data that was provided to
21 it on the Ameritech order status report dated
22 4/29/97. I don't expect you to be able to verify

1 this. I'll just ask you to accept it as true
2 subject to verification with supporting data, if
3 necessary.

4 If this was the evidence of backlogged
5 855s for April 17th through the 28th showing the
6 number of 855s that were backlogged for each day,
7 would this evidence affect your opinion as to
8 operational readiness?

9 A You know, just looking at this, I couldn't
10 really tell you. I'm not in a position to
11 evaluate the causes. Some of these could have
12 been caused by a CLEC submitting an order with
13 the wrong data. I just don't know.

14 Q If these were not attributable to CLEC
15 errors and order submission but were instead
16 attributable to the system's inability to process
17 these orders, would that affect your opinion as
18 to operational readiness?

19 A It could, but I just don't have the data
20 to verify that one way or another.

21 Q Can you explain to me why 309 orders that
22 were inserted into the Ameritech system on 4/25

1 had not yet received an 855 notification as of
2 4/29?

3 A No, I couldn't.

4 Q Is that an issue or a problem that your
5 team assessed or reviewed?

6 A No, it is not.

7 Q Did you make -- did your team make any
8 attempt to evaluate what is known in the
9 Ameritech system as LP errors?

10 A No. I've heard of those, and I believe
11 they come out of one of the legacies, ASA system
12 or ASON (ph).

13 Q And because they're related to the legacy
14 system, is that likewise something else that's
15 outside the scope of your review?

16 A Right.

17 Q Let's talk a little bit about manual
18 intervention. You did conduct an assessment of
19 manual intervention; is that correct?

20 A That's correct.

21 Q And I believe that your testimony was that
22 the level of manual intervention that was being

1 seen did not concern you; is that correct?

2 A That's correct.

3 Q And, in fact, you testified that the level
4 of manual intervention was decreasing over time;
5 is that correct?

6 A Yeah. Based on the three months we looked
7 at it, it appeared to be, right.

8 Q Would it concern you -- I'm sorry. Let's
9 look at your schedule that you prepared on that
10 which, I believe, is Schedule 4 to your
11 testimony.

12 Now, according to your Schedule 4, the
13 level of manual intervention was down to 26.7
14 percent in March; is that correct?

15 A That's correct.

16 Q Would it concern you if the level of
17 manual intervention for orders processed in April
18 was up to 44 percent?

19 A Not necessarily, no.

20 Q And would that affect your opinion as to
21 operational readiness?

22 A No. I mean, manual intervention, in my

1 opinion, does not affect operational readiness.
2 They're two separate and distinct issues.

3 Q And why does manual intervention not
4 affect operational readiness?

5 A Because my understanding is that Ameritech
6 has service level agreements or interconnection
7 agreements or something with carriers that
8 specifies the time intervals that they will meet
9 for various activities. And as long as they meet
10 those commitments, those service level
11 agreements, which seem to me that's the relevant
12 measure.

13 Q Did your team make any attempt to assess
14 Ameritech's ability of performance on due dates
15 for the period that you reviewed?

16 A No.

17 Q Wouldn't that be important in connection
18 with the opinion you just rendered to determine
19 whether Ameritech is indeed meeting its due
20 dates?

21 A It could be, sure. But I mean that's not
22 something I looked at, so it's hard for me to

1 render an opinion one way or another.

2 Q Well, you just told me that manual
3 intervention to you is not a significant issue as
4 long as Ameritech was meeting its service
5 commitment; is that correct?

6 A Right.

7 Q And as I understand your testimony, your
8 team made no attempt to determine whether
9 Ameritech was indeed meeting the service
10 commitment; is that true?

11 A Yeah. There could be a variety of
12 reasons. But that's true, we did not look at
13 why.

14 Q Did your team make any attempt to
15 determine whether Ameritech was modifying CLEC
16 requested due dates to meet service commitments?

17 A No.

18 Q Now, what's your -- did you -- in your
19 assessment of manual intervention, did you make
20 any effort to determine the reason why orders
21 were falling to manual?

22 A Well, Ameritech explained to us one of the

1 things we looked at in our capacity model for
2 manual was the types of orders that went to
3 manual so we could estimate the work effort
4 required to work those orders.

5 Q Did you make any effort to determine
6 whether the reasons it was falling to manual --

7 Did you make any effort to determine
8 the reasons why the orders were falling to manual
9 driven by CLEC problems or by Ameritech problems?

10 A Well, my understanding is Ameritech chose
11 to process certain types of orders manually.

12 Q And did you make any effort to determine
13 whether that was an efficient way for Ameritech
14 to process those orders?

15 A We talked about that with Ameritech, and
16 it was driven by their business reasons and cost
17 benefit analysis of whether or not it would be
18 cost justified to make such a change.

19 Q Would you agree with me that manual
20 intervention or manual processing is more
21 inefficient than electronic processing?

22 A No.

1 Q You would not agree with that?

2 A No.

3 Q Would you agree with me that manual
4 processing is more prone to error than electronic
5 processing?

6 A No.

7 Q Did you see any evidence in your review
8 that manual processing causes delays?

9 A No. We did look at the Wisconsin Service
10 Center where some of the manual processing
11 occurred. And in terms of what was being done to
12 those orders, it did not concern us as far as,
13 you know, the delay.

14 You're looking at usually a 24-hour
15 window on these order acknowledgments and so
16 forth. And some of these delays were just a few
17 seconds, you know, to pass an order through or
18 some modification.

19 Q Let me hand you what I've marked as AT&T
20 Cross Exhibit No.

21

22

1 (Whereupon, AT&T Cross
2 Exhibit No. 20 was
3 marked for identification,
4 as of this date.)

5 BY MS. MARSH:

6 Q On the first page, if I could turn your
7 attention to the 855 response times for Illinois
8 for orders that were completed, do you see that?

9 A Yes.

10 Q Does that data there suggest to you that
11 it is much more likely for an 855 response to be
12 in excess of 24 hours if the order was completed
13 on a manual basis?

14 A Where does it break out what's manual
15 versus not manual?

16 Q If you see the two lines that say
17 complete, there's one for auto process and one
18 for manual process. Do you see that?

19 A At the bottom.

20 MS. SUNDERLAND: I'm going to object to the
21 witness being asked to say anything about this
22 exhibit. It's obvious that he's never seen it

1 before.

2 MS. MARSH: He's an expert who purports to
3 have made a review of Ameritech's operation
4 support systems and just told me he saw no
5 evidence that manual processing causes delays.

6 MS. SUNDERLAND: If she wants to ask him
7 whether he saw this report, that's one thing. If
8 she wants to cross-examine on the contents, I
9 think that's beyond the scope of his testimony.
10 He obviously has not seen it before and is not in
11 a position to testify.

12 MS. MARSH: He's a systems expert. If he can
13 render any testimony or an opinion on this
14 document, I would like it. If he can't offer me
15 any opinions, then he can give me that answer.

16 JUDGE GUERRA: Whose document is this?

17 MS. MARSH: It is an Ameritech generated
18 document that relates to service readiness
19 testing by AT&T and Ameritech.

20 JUDGE GUERRA: Mr. Meixner, have you ever
21 seen this document?

22 THE WITNESS: No.